

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

YOON DOELGER, and
PETER DOELGER,

Plaintiffs,

vs.

JPMORGAN CHASE BANK, N.A., and
CHICKASAW CAPITAL MANAGEMENT,
LLC,

Defendants.

No. 1:21-cv-11042-AK

**DEFENDANTS' RESPONSE TO PLAINTIFFS'
MOTION FOR THE COURT TO RULE ON THE
JOINT MOTION FOR PARTIAL FINAL JUDGMENT**

Defendants JPMorgan Chase Bank, N.A. ("JPMC") and Chickasaw Capital Management, LLC ("Chickasaw," and together with JPMC, "Defendants") respectfully submit this Response concerning the Motion For The Court To Rule On The Joint Motion For Partial Final Judgment (Doc. Nos. 432-433, the "Motion") that Plaintiffs filed on November 8, 2024 to "resolve potential jurisdictional issues with the Doelgers' appeal" (Doc. No. 432).¹ To the extent it assists the Court in resolving the Motion, Defendants write to inform the Court that they take no position on the Motion and have no intention to submit an opposition.² Beyond this, Defendants defer entirely to the Court on how to proceed regarding the issues raised in the Motion.

Defendants are available if the Court determines that they can be of further assistance in this matter.

¹ Defendants note that Plaintiffs filed a related motion with the First Circuit on November 13, 2024. *See* Motion To Direct The District Court To Rule On The Parties' Joint Rule 54(B) Motion, Case No. 24-2000 (1st Cir. Nov. 13, 2024) (Doc. No. 00118213992).

² To the extent relevant, Defendants stand by their submissions in connection with the motions that are administratively stayed (*see* Doc. Nos. 422-423, 424-425).

Dated: November 15, 2024

Respectfully submitted,



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CERTIFICATE OF SERVICE

I, Tracy O. Appleton, hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing on November 15, 2024, and that paper copies will be sent to those indicated as non-registered participants on November 15, 2024.

/s/ Tracy O. Appleton

Tracy O. Appleton